Unofficial Comment Form

Project 2021-03 CIP-002

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on the **Project 2021-03 Standard Authorization Request (SAR) by 8 p.m. Eastern, Friday, August 18, 2023.   
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project%202021-03%20CIP-002%20Transmission%20Owner%20Control%20Centers.aspx). If you have questions, contact Standards Developer, [Dominique Love](mailto:Dominique.Love@nerc.net) (via email), or at 404-217-7578.

## Background Information

The purpose of Reliability Standard CIP-002-5.1a is “[to]identify and categorize Bulk Electric System (BES) Cyber Systems and their associated BES Cyber Assets for the application of cyber security requirements commensurate with the adverse impact that loss, compromise, or misuse of those BES Cyber Systems could have on the reliable operation of the BES. Identification and categorization of BES Cyber Systems support appropriate protection against compromises that could lead to misoperation or instability in the BES.”

Criterion 1.3 needs to have Criterion 2.6[[1]](#footnote-1) reinserted into the Transmission Operator (TOP) to ensure proper high impact categorization of BES Cyber System(s) related to Transmission assets that are identified as critical to the derivation of Interconnection Reliability Operating Limits (IROLs) and their associated contingencies as also required of the Balancing Authority (BA) in Criterion 1.2 and the Generator Operator (GOP) in Criterion 1.4.

The proposed project will require the TOP to categorize its BES Cyber Systems as high impact that meet Criterion 2.6 as is also required of the BA and GOP in Criterion 1.2 and 1.4, respectively. By including Criterion 2.6 in Criterion 1.3, the TOP’s BES Cyber Systems will be properly categorized as high impact for transmission facilities at a single station or substation location that is identified “as critical to the derivation of IROLs and their associated contingencies.”

**Questions**

1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation and explanation.

Yes

No

Comments:

1. Provide any additional comments for the Standard drafting team to consider, if desired.

Comments:

1. Criterion 2.6 reads: “Generation at a single plant location or Transmission Facilities at a single station or substation location that are identified by its Reliability Coordinator, Planning Coordinator, or Transmission Planner as critical to the derivation of Interconnection Reliability Operating Limits (IROLs) and their associated contingencies.” [↑](#footnote-ref-1)